

WORKERS' LOCAL UNION NO. 28 ANNUITY FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 PENSION FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 JOINT LABOR MANAGEMENT FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 EDUCATION FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 SCHOLARSHIP FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 ASSESSMENTS FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 POLITICAL ACTION FUND, SHEET METAL WORKERS' LOCAL UNION NO. 28 BUILDING FUND, and INTERNATIONAL ASSOCIATION OF SHEET METAL, AIR, RAIL AND TRANSPORTATION WORKERS' LOCAL UNION NO. 28, AFL-CIO, will move this Court, before the Honorable Paul A. Engelmayer, United States District Judge, at the United States Courthouse for the Southern District of New York located at 40 Foley Square, Courtroom 435, New York, New York 10007 on a date to be determined by the Court, for an Order pursuant to Rule 55 of the Federal Rules for Civil Procedure granting judgment by default against Defendant.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 15, 2021
Woodbury, New York

Respectfully submitted,

COLLERAN, O'HARA & MILLS L.L.P.



By: _____
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